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April 26, 2006

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VIA FACSIMILE AND U.S. MAIL

John F. Hornick, Esq.
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
901 New York Avenue, N.W.
Washington, D.C. 20001Re: ConnectU v. Zuckerberg, et. al.

Dear John:

The Facebook Defendants are in receipt of your letter of April 25, 2006 related to Magistrate Judge Collings' denial of ConnectU's motion to compel a further response to Interrogatory No. 16.

You incorrectly contend that the Court's ruling requires the Facebook Defendants to turn over substantial documentation alleged to be subject to several prior Requests for Production. The Requests you cite are the subject of pending Motions to Compel and Cross-Motions for a Protective Order and were not referenced in the Court's ruling. The Court's ruling related solely to Interrogatory Responses, rather than document production.

The Facebook Defendants do not believe the Court's statement that "the plaintiffs may seek financial documents to determine the present value of the facebook, Inc. and the facebook.com website" translates into receiving unlimited discovery via letter demands. Moreover, ConnectU first must identify how a particular document relates to "present value" before it can demand unbridled access to such information. ConnectU has not done so. By way of example, you cite voting rights agreements as being somehow relevant to present value, without any explanation why.

The Facebook Defendants will produce any documents that the Court orders produced as a result of the pending Motions to Compel. However, until such a ruling(s), coupled with a specific identification how documents relate to determining present value, the Facebook Defendants do not agree they are under obligation to respond to the demands set forth in your April 25, 2006 correspondence. On the other hand, the Facebook Defendants have no objection to discussing this issue in conjunction with the meet and confer scheduled for April 28, 2006, as you request.

Please let me know if you need any further information.



John F. Hornick, Esq.
April 26, 2006

~~Very truly yours,~~



Monte Cooper

cc: Margaret A. Esquenet, Esq. (via email)
Troy E. Grabow, Esq. (via email)
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